

RECEIVED AND FILED - MAIL
USBC '23 OCT 10 AM 8:52

ATTN: CLERK OF THE COURT
JOSE TOLEDO COURTHOUSE
300 CALLE DEL RECINTO # 109
SAN JUAN, PR 00901-1964

FILING FOR 23-02870 MUSZYNSKI

EXHIBIT NUMBER ONE

FOR FILING MADE 4 OCTOBER 2023
SUBMITTED BY CHARLES MUSZYNSKI

10/4/23, 11:50 AM

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Re: Meet and Confer

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USBC '23 OCT 10 AM 8:52

From usfilefolder <usfilefolder@protonmail.com>
To Carmen D. CondeTorres <condecarmen@condelaw.com>
Date Monday, October 2nd, 2023 at 10:50 AM

Bueno día Sra. Conde-Torres:

Please see the Urgent Motion for Automatic Stay enforcement filed today and contact me if there is any follow up required.

Thank you,

Charles

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Thursday, September 21st, 2023 at 6:28 PM, Carmen D. CondeTorres <condecarmen@condelaw.com> wrote:

Dear Mr. Charles Muszynski: It is Mr. Culpepper's position that there has been no violation of the stay. You may proceed as you deem appropriate. Cordially, C. Conde

Carmen D. Conde Torres
C. Conde & Assoc.
Law Offices
254 De San José Street
Suite 5
San Juan, PR 00901-1523
Tel. 787-729-2900
787-722-7272
Fax. 787-729-2203
E-Mail: condecarmen@condelaw.com

C. Conde & Assoc.
LAW OFFICES

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From: usfilefolder <usfilefolder@protonmail.com>
Sent: Thursday, September 21, 2023 5:08 PM
To: Carmen D. CondeTorres <condecarmen@condelaw.com>
Subject: Re: Meet and Confer

Sra. Conde - I'm pro se.

I'll hold off on the filing until tomorrow at 5:00 Eastern as I just saw your reply and it's now 5:07.

Messrs. Culpepper and Rothman need education on automatic stay violations. It's serious and so am I.

Cordially,

Charles

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Thursday, September 21st, 2023 at 3:28 PM, Carmen D. CondeTorres <condecarmen@condelaw.com> wrote:

Dear Mr. Charles Muszynski: I am not very familiar with your case, but will discuss your concerns with Mr. Culpepper. Can you please have your local counsel call me to discuss any legal matter? Cordially, C. Conde

Carmen D. Conde Torres

C. Conde & Assoc.

Law Offices

254 De San José Street

Suite 5

San Juan, PR 00901-1523

Tel. 787-729-2900

787-722-7272

Fax. 787-729-2203

E-Mail: condecarmen@condelaw.com

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From: usfilefolder <usfilefolder@protonmail.com>

Sent: Thursday, September 21, 2023 12:03 PM

To: Carmen D. CondeTorres <condecarmen@condelaw.com>; Kerry Culpepper <kculpepper@culpepperip.com>; Joel Rothman <joel@sriplaw.com>; joel.rothman@sriplaw.com <joel.rothman@sriplaw.com>; alemanywilliam@condelaw.com <alemanywilliam@condelaw.com>

Subject: Meet and Confer

Good morning Sra. Conde Torres:

This meet and confer relates to Re: Charles Muszynski, Case # 23-02870 due to continuing automatic stay violations by "movie company" creditors' representation.

Your firm represents the "movie company" creditors' in the current bankruptcy case in San Juan, which also show an appearance today by Mr. Culpepper as a pro se litigant and admission as pro hac vice on behalf of "movie company" creditors.

Rothman and Culpepper have, since the imposition of the automatic stay on 11 May 2023, committed dozens of documented automatic stay violations and continue to do so. They filed willful, violations in the SDFL Court during the last 30 days, the latest, a Motion entered yesterday as Doc. #555 and #555-1.

I conducted a meet and confer with Rothman and Culpepper regarding their penultimate filing, Doc. 545 in the SDFL action too and filed a Motion for Show Cause hearing subsequently denied by the SDFL Court - which has refused to enforce the automatic stay, only recognizing it's own stay regarding "Motions", not the bankruptcy Court's automatic stay. Creditors are choosing to file their Motions in the SDFL court to circumvent the Bankruptcy Court's overarching automatic stay.

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It is well recognized creditors have the duty to affirmatively dissolve prepetition Writs of Garnishment related to collection efforts targeting assets of an individual's bankruptcy estate and that post-petition Writs of Garnishment collection attempts regarding same are prohibited.

Undeterred by Statute and Case Law, "movie company" creditors' continuing filings in the SDFL Court attempt to circumvent precedent by claiming to pursue "other debtors" while simultaneously including my personal name in their actions, again violating the automatic stay by continuing to take actions to collect against me personally and plainly state this in their filings. This resulted in my filing (attached), Doc. #551 (SDFL).

Please remedy these willful errors by 5:00 p.m. today and bring the "movie company" creditors into compliance with requirements of the automatic stay by withdrawing their willful, violative filings in the underlying SDFL action.

Given the champertous arrangement "movie companies" creditors' have with their primary representation, it's unlikely they're aware of the peril their counsels tread upon. Nonetheless, "movie company" creditors are responsible for their attorneys' actions - thumbing their noses at the Bankruptcy Court.

Also, an appeal of the recent Texas Orders will be filed shortly.

Sincerely,

Charles Muszynski

Sent with [Proton Mail](#) secure email.

1.06 MB 1 file attached 2 embedded images

Outlook-t4boscqe.jpg 52.83 KB Outlook-3wokjafo.jpg 52.83 KB

20231002 FINAL Motion for enforcement of Automatic Stay Violations.pdf 975.42 KB

10/4/23, 12:47 PM

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Re: Meet and confer - continuing automatic stay violations

From usfilefolder <usfilefolder@protonmail.com>
To Carmen D. CondeTorres <condecarmen@condelaw.com>
Date Thursday, September 28th, 2023 at 12:59 PM

Sra. Conde-Torres:

My apologies, I forgot to attach the referenced documents.

Charles

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Thursday, September 28th, 2023 at 12:37 PM, usfilefolder <usfilefolder@protonmail.com> wrote:

Sra. Conde-Torres:

I am contacting you regarding additional Automatic Stay violations stemming from your clients and "movie company" Creditors filings, in the S.D. FL action, Doc. #560 and #560-1 through #560-9 made yesterday.

The filings relate to "movie company" Creditors' Writ of Garnishment on Terry Lacy therein issued in December 2022 in furtherance of collection activity against a Debtor.

Automatic Stays require collection actions immediately cease and affirmatively obligate creditors to cease post petition collection activity and dissolve all pre-petition writs. They have a duty to return a Debtor to status quo as of the time of the petition.

Please have your clients withdraw their latest violation of the automatic stay violations by 5:00 p.m. Eastern today.

Thank you,

Charles Muszynski

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5.12 MB 10 files attached

20230927 #560 Discovery hearing for 2 october.pdf 192.33 KB 20230927 #560-8 Nsischo info.pdf 116.02 KB

20230927 #560-1 Terry RFP Responses.pdf 237.77 KB 20230927 #560-2 Terry ROG Answers.pdf 541.36 KB

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20230927 #560-9 Email 2.11.23.pdf 129.09 KB 20230927 #560-7 Hermiestiglitz email.pdf 151.94 KB

20230927 #560-5 email 2.9.21.pdf 152.51 KB 20230927 #560-4 Email 2.28.21 Terry.pdf 1.27 MB

20230927 #560-6 email 2 21.pdf 602.72 KB 20230927 #560-3 1701 mgt PDR Form.pdf 1.78 MB

10/4/23, 12:48 PM

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RE: Meet and Confer: Re: Legal Correspondence

From usfilefolder <usfilefolder@protonmail.com>
To Kerry Culpepper <kculpepper@culpepperip.com>
CC joel.rothman@sriplaw.com, Joel Rothman <joel@sriplaw.com>
Date Wednesday, September 20th, 2023 at 8:49 AM

Gentlemen:

This meet and confer relates to the third, latest stay violation, document #533 entered in the SDFL matter, another willful violation of that Court's stay Order and a violation of the automatic stay in the bankruptcy Court of Puerto Rico.

Please retract your filing by 5:00 p.m. today.

According to the record in SDFL, the collection activity in which you continue to engage attempts to collect a debt from "Charles Muszynski". These continuing, illegitimate "end-run" collection tactics circumvent the SDFL Order and violate the bankruptcy process.

CM

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Thursday, September 14th, 2023 at 4:47 AM, usfilefolder <usfilefolder@protonmail.com> wrote:

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Tuesday, September 12th, 2023 at 10:29 PM, kculpepper culpepperip.com <kculpepper@culpepperip.com> wrote:

I disagree. But Dusko Popov answered the writ, so this issue is moot.

KSC

From: usfilefolder <usfilefolder@protonmail.com>

Sent: Tuesday, September 12, 2023 1:37 PM

To: kculpepper culpepperip.com <kculpepper@culpepperip.com>; joel.rothman@sriplaw.com; Joel Rothman

10/4/23, 12:48 PM

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<joel@sriplaw.com>

Subject: Meet and Confer: Re: Legal Correspondence

Gentlemen:

This meet and confer relates to the latest stay violations, a document entered in the SDFL matter that is a violation of that Court's stay Order and a violation of the automatic stay in the bankruptcy Court.

Please retract your filing by 10:00 a.m. Eastern tomorrow.

According to the record in SDFL, the collection activity in which you continue to engage attempts to collect a debt from "Charles Muszynski". These continuing, illegitimate "end-run" collection tactics circumvent the SDFL Order and violate the bankruptcy process.

CM

----- Original Message -----

On Tuesday, September 12th, 2023 at 1:34 PM, kculpepper culpepperip.com <kculpepper@culpepperip.com> wrote:

10/4/23, 12:49 PM

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RE: Meet and confer

From Kerry Culpepper <kculpepper@culpepperip.com>

To usfilefolder<usfilefolder@protonmail.com>

Date Monday, August 14th, 2023 at 9:50 PM

Mr. Muszynski,

I disagree with your assessment of the facts. Any such motion would be utterly meritless.

Further your email below is a gross distortion of the order [Doc. #502]. Absolutely no where does it say "related to" Charles Muszynski. Indeed, the stay only applies "to the Extent Plaintiffs seek to collect on the Judgment entered in their favor **and** against Defendant Charles Muszynski".

You cannot point to any "collection" activities against you. In the contrary, you filed in application in Nevis and a motion for clarification in SDFL in flagrant violation of the automatic stay. Your assertion is the epitome of a pot calling the kettle black.

Sincerely,

/ksc/

Kerry S. Culpepper

From: usfilefolder <usfilefolder@protonmail.com>

Sent: Monday, August 14, 2023 2:10 PM

To: kculpepper culpepperip.com <kculpepper@culpepperip.com>

Subject: RE: Meet and confer

Mr. Culpepper:

The entirety of my personal assets were disclosed to the bankruptcy court. To be clear, and despite your baiting email, no entities or individuals hold any of my personal assets, this means too, the entities mentioned in your email.

Both you and Rothman were ordered to cease collection and litigation activity related to me, "Charles Muszynski", in Doc. 502 and by the bankruptcy court's automatic stay.

10/4/23, 12:49 PM

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Despite this, your email confirms both you and Rothman continue to willfully violate the Order in Miami and the Automatic Stay in Beaumont by attempting to collect a debt against Charles Muszynski, as I am named in the service of documents #324 and #399. Whether served to a street beggar, Wells Fargo, or the entities in the affidavit, none of them hold my assets.

Cm

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Monday, August 14th, 2023 at 5:23 PM, kculpepper culpepperip.com <kculpepper@culpepperip.com> wrote:

Hello Mr. Muszynski,

To be clear, from your draft motion for OSC, your position is that Dusko Popov Trust and Sapphire International Shield, LLC are holding your funds, and enforcement of a writ of garnishment against Dusko Popov Trust violates DE 502 which states "This Case is Stayed to the Extent Plaintiffs seek to collect on the Judgment entered in their favor and against Defendant Charles Muszynski"?

Sincerely,

/ksc/

Kerry S. Culpepper

From: usfilefolder <usfilefolder@protonmail.com>

Sent: Monday, August 14, 2023 11:08 AM

To: kculpepper culpepperip.com <kculpepper@culpepperip.com>

Subject: RE: Meet and confer

Docs 524 & 524-1; see attached.

Sent with [Proton Mail](#) secure email.

10/4/23, 12:49 PM

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----- Original Message -----

On Monday, August 14th, 2023 at 1:29 PM, kculpepper culpepperip.com <kculpepper@culpepperip.com> wrote:

Mr. Muszynski,

Your email is very vague.

Please indicate the "attempts for collection" and the orders (by DE#) in the ED Tx and SD FI actions that were violated.

Sincerely,

Kerry S. Culpepper

From: usfilefolder <usfilefolder@protonmail.com>

Sent: Monday, August 14, 2023 6:56 AM

To: kculpepper culpepperip.com <kculpepper@culpepperip.com>

Subject: Meet and confer

Mr. Culpepper - you and Rothman have made multiple attempts for collection that violate both the E.D. Texas automatic stay and the Order of S.D. FL as indicated by the record in the latter's Clerk's file.

Now that you've been notified of the multiple violations will you and your pro hac vice host immediately withdraw them?

Cm

Sent with [Proton Mail](#) secure email.

10/4/23, 12:50 PM

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Meet and confer/copy of filing

From usfilefolder <usfilefolder@protonmail.com>

To Kerry Culpepper <kculpepper@culpepperip.com>

Date Friday, August 11th, 2023 at 11:30 AM

Mr. Culpepper -

Documents you most recently filed in SDFL court violate the court's Order therein and the EDTX court's Stay as they are collection attempts related to "Charles Muszynski".

This notice is an opportunity to correct the contempt of the SDFL court and violation of the EDTX automatic stay.

If withdrawn by the end of business today, there will be no need to make motion for a SCO hearing in Miami for contempt by "movie company" Creditors nor in Beaumont for notice of violation of stay.

Attached is a copy of the filing in S.D. FL submitted for clarification.

CM

Sent with [Proton Mail](#) secure email.

40.87 KB 1 file attached

20230808 Motion for Clarification.docx 40.87 KB

10/4/23, 12:51 PM

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Re: Meet and confer

From Kerry Culpepper <kculpepper@culpepperip.com>

To usfilefolder<usfilefolder@protonmail.com>

Date Thursday, August 3rd, 2023 at 11:41 AM

I don't understand the clarification that you want.

Get [Outlook for iOS](#)

From: usfilefolder <usfilefolder@protonmail.com>

Sent: Thursday, August 3, 2023 2:49:23 AM

To: kculpepper culpepperip.com <kculpepper@culpepperip.com>

Subject: Meet and confer

Mr. Culpepper - As a Debtor, I do not think this m&c entirely necessary given its nature but am providing it out of caution for compliance with local rules in both EDTX and SDFL.

I am going to request clarification from the Miami Court regarding its Order for the last-concluded "contempt" hearing prior to implementation of the stay as there appears to be differing opinion regarding the Court's Orders.

If you object, would you agree to a stipulated, limited modification of stay, only as it applies to clarification of the Miami Court's clarification?

cm

Sent with [Proton Mail](#) secure email.

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Meet and Confer; document request

From usfilefolder <usfilefolder@protonmail.com>

To Kerry Culpepper <kculpepper@culpepperip.com>

Date Monday, July 17th, 2023 at 12:15 PM

Mr. Culpepper:

The following documents are requested for produced in preparation for the 22 August 2023 hearing. Please contact me to discuss arrangements for same.

Charles

DOCUMENTS REQUESTED

10/4/23, 12:53 PM

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1. Any/all Certificates of Existence confirming ownership and legitimate existence of each of the "Movie company" Creditors alleged to exist, represented by CulpepperIP, LLLC in the case styled: Millennium Funding, Inc. v. 1701 Management, LLC. (1:21-cv-20862) District Court, S.D. Florida filed on 3 March 2021 and appearing as "creditors".
2. Any/all Certificates of Existence confirming ownership and legitimate existence of each of the "Movie company" Creditors alleged to exist, represented by CulpepperIP, LLLC in the case styled: Millennium Funding, Inc. v. 1701 Management, LLC. (1:21-cv-20862) District Court, S.D. Florida filed on 28 March 2022 and appearing as "creditors".
3. Any/all documents confirming the officers, managers, and/or members for each "Movie company" Creditor entity on 3 March 2021.
4. Any/all documents confirming the officers, managers, and/or members for each "Movie company" Creditor entity on 28 March 2022.
5. Any/all documents evidencing any/all persons having authority to contract on behalf of each "Movie company" Creditor on 3 March 2021.
6. Any/all documents evidencing any/all persons had authority to contract on behalf of each "Movie company" Creditor entity on 28 March 2022.
7. Any/all documents evidencing engagement(s) between any alleged "Movie company" Creditors of CulpepperIP, LLLC related to the instant matter and/or the underlying S.D. Miami case.
8. Any/all documents of ownership by Kerry Culpepper in "Movie company" Creditors personally.
9. Any/all documents of ownership by CulpepperIP, LLC in "Movie company" Creditors.
10. Any/all documents of ownership by any entity and/or individual involving CulpepperIP and/or Kerry Culpepper individually in "Movie company" Creditors.
11. Any/all documents between any/all "Movie company" Creditors regarding joinder as stated in Creditors' June 28, 2023 motion for stay relief in which Movie Creditors joined Culpepper's motion for stay relief, see Doc. #23.
12. Any/all documents and/or communications between Bankruptcy Trustee Zayler and Kerry Culpepper.
13. Any/all documents and/or communications between Bankruptcy Trustee Zayler and CulpepperIP, LLLC.
14. Any/all documents and/or communications between Bankruptcy Trustee Zayler and "Movie company" Creditors and Bankruptcy Trustee Zayler.
15. Any/all documents and/or communications between Kerry Culpepper and any other party (parties) listed on the Creditor Matrix, including all updates.
16. Any/all documents and/or communications between any party (parties) listed on the Creditor Matrix and CulpepperIP, LLLC.
17. Any/all documents and/or communications between any party (parties) and Kerry Culpepper regarding alleged "trusts", "llcs", "corporations", or other entities alleged to involve Debtor.
18. Any/all documents and/or communications between any party (parties) and CulpepperIP, LLLC regarding Debtor's alleged control, ownership, direction and/or any other form of involvement in: "trusts", "llcs", "corporations", or other entities.

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19. Any/all documentation proving Kerry Culpepper was involved in "international travel" that prevented his attendance or the ability to arrange his associates' attendance at Debtor's 341a meeting held on "1 June 2023", see Doc. 44.
20. Any/all documents and/or communications between CulpepperIP, LLC and any/all parties related to writs of garnishment issued regarding Debtor.
21. Any/all documents relating to the basis for "Movie company" Creditors' motion for stay relief in Doc. #40.
22. Any/all documents establishing Kerry Culpepper is owed money by the Debtor, evidencing his alleged Creditor status.
23. Any/all documents related to trusts allegedly related to Charles Muszynski referenced in the stay lift – trust that I'm a beneficiary, he "believes" I have an interest in, etc.
24. Any/all documents and/or communications between Debtor and any/all US tax preparers and/or CPAs.
25. All writs and filings related to collection actions for Muszynski in any other District or international action.
26. Any/all correspondence related to third party communications regarding Debtor – such as "The Hollywood Reporter", "Variety", tech blogs, and/or any other publicity efforts by "Movie company" Creditors and/or their representation intended to make Debtor a "public figure".
27. Any/all documents and/or correspondence related to collection efforts in the Federation of St. Christopher and Nevis.
28. Any/all documents related to "Movie company" Creditors' and their representative's claims in Doc. #23 that establish any basis for allegations that: "...the Debtor, Charles Muszynski ("Muszynski"), his co-defendants, 1701Management LLC ("1701"), and AUH20 LLC ("AUH20") and the entities Muszynski controls including but not limited to Waste Resources LLC (New Mexico); F.A Hayek Irrev. Settlement Trust; The Dusko Popov Irrev. Trust (Nevis); and Antilles Management LLC" are "...depleting estate assets or moving estate assets outside of the jurisdiction of the United States pursuant to this Court's equitable powers under 11 U.S.C. § 105(a)."
29. Any/all documents related to "Movie company" Creditors' and their representative's claims in Doc. #23, that establish any basis for allegations therein that Debtor has any control, ownership, direction, or involvement in any of the entities listed in Doc. 23 and/or any other entities variously alleged throughout their collection actions (such as Glo-Jet, Glo-Jet International, Federal Minerals, etc.).
30. Any/all documents establishing that Debtor has any assets or property other than that reported in his initial filing with the E.D. Bankruptcy Court.
31. Any/all documents provided to the Bankruptcy Trustee, Stephen Zayler.
32. Transcripts of any/all hearings related to the S.D. Miami related to Case No.: 21-cv-20862-BB, discovery hearings before Federal Magistrate Judge Alicia M. Otazo-Reyes conducted on April 11, 2023 and May 12, 2023 wherein "Movie company" Creditors' representation discusses

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obtaining Debtors federal tax returns for 2018 and 2019 and requests the Court require production of additional returns.

33. Any/all retainer agreements between CulpepperIP, LLLC and "Movie company" Creditors.
34. Any/all retainer agreements between "Movie company" Creditors and SRIPLAW, Inc., of Florida.
35. Any/All retainer agreements between "Movie company" Creditors and Rowe & Rowe in the collection action in St. Christopher and Nevis.
36. Any/all documents related to Trevor Short, a resident and domiciliary of Nevada
37. Any/all documents related to Avi Lerner, a resident and domiciliary of Nevada.
38. Any/all participation/champerty agreement(s) between CulpepperIP, LLLC and any entity(ies) related to the collection action.
39. Any/all documents and/or subpoenas to third-parties in attempted collection actions related to Debtor or other related entities.
40. Any/all documents and/or subpoena responses from third-parties in attempted collection actions related to Debtor or other related entities.
41. Any/all documents related settlements/discovery involving David Cox, SMR Hosting, LLC, SMR Hosting, Inc., Marcia Waddell, Michael Gamache, Robert Pola, Talismark, and/or any other individual and/or entity that has received a writ and/or subpoena.
42. Any/all documents related to initial service made to Debtor in the underlying S.D. Miami matter.
43. Any/all documents related to "Rule 11" motions you have submitted against opposing counsel.
44. Any/all documents related to "Rule 11" motions opposing counsel(s) have submitted against you.